

March 8, 2006

By E-File

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th St. SW, Room TW-B204  
Washington, DC 20554

Re: Zone Telecom Inc.  
WC DK No.06-31, DA 06-395  
WC DK No.06-35, DA 06-396  
ITC-T/C-20060109-00012  
ITC-T/C-20060123-00034  
ITC-T/C-20060123-00035  
Domestic and International Section 214 Applications for Consent to  
the Transfer of Control of Central Utah Communications Leasing, LC  
and Strategic Alliance Management, Inc. to Zone Telecom, Inc. and Pro  
Forma Notification Regarding the Inclusion of Cyberman Limited in  
Zone Telecom, Inc. ownership structure

Dear Ms. Dortch:

The Department of Homeland Security ("DHS") with the concurrence of the Department of Justice ("DOJ"), including the Federal Bureau of Investigation ("FBI"), requests that the Federal Communications Commission ("Commission") defer action on the applications of Zone Telecom, Inc. to transfer control of Central Utah Communications Leasing, LC and Strategic Alliance Management, Inc.'s domestic and international authorizations under section 214 of the Communications Act of 1934 to Zone Telecom, Inc. DHS, with the concurrence of DOJ and the FBI also requests that the FCC defer acceptance of the pro forma notification regarding the inclusion of Cyberman Limited, a British Virgin Islands company, in its ownership structure. We ask that the FCC defer these actions until such time as DOJ, FBI, and DHS (i) notify the Commission that potential national security, law enforcement, and public safety issues raised by the application have or have not been resolved, and (ii) on that basis, request appropriate action by the Commission. Necessarily, DOJ, FBI, and DHS also request that the Commission remove the application from streamlined processing.

After receiving notice of the applications, DOJ, FBI, and DHS have been reviewing these matters to determine if they may raise national security, law enforcement, and public safety concerns. DOJ, FBI, and DHS will advise the Commission promptly upon completion of our review.

Thank you for your consideration.

Sincerely,

/s/ STEWART A. BAKER

Stewart A. Baker  
Assistant Secretary for Policy, Planning, and International Affairs  
United States Department of Homeland Security

cc: Zone Telecom, Inc.  
Best Copy and Printing  
Tracey Wilson-Parker  
Adam Kirschenbaum  
Renee Crittendon  
Susan O'Connell  
James Bird  
George Li  
Jack Barrett